

LAGOMARSINO LAW

ANDRE M. LAGOMARSINO, ESQ. (#6711)

TAYLOR JORGENSEN, ESQ. (#16259)

3005 W. Horizon Ridge Pkwy, #241

Henderson, Nevada 89052

Telephone: (702) 383-2864

Facsimile: (702) 383-0065

AML@lagomarsinolaw.com

Taylor@lagomarsinolaw.com

*Attorneys for Plaintiff Carlos Alvarado***UNITED STATES DISTRICT COURT****DISTRICT OF NEVADA**

CARLOS ALVARADO, an individual

Plaintiff

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT a political subdivision of the
State of Nevada; OFFICER C. HUNT,
individually; OFFICER A. MONTALBANO,
individually

Defendants.

CASE NO.: 2:24-cv-01159-JAD-MDC

**STIPULATION AND ORDER TO EXTEND
THE DEADLINE TO FILE OPPOSITION
TO LVMPD DEFENDANTS' MOTION FOR
SUMMARY JUDGEMENT****(First Request)**

[ECF No. 41]

Pursuant to LR IA 6-1 and LR 26-3, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the deadline for the Plaintiffs to file their Opposition to LVMPD Defendants' Motion for Summary Judgement in the above-captioned case twenty-one (21) days, up to and including Tuesday, September 30, 2025.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extension is based upon the following:

Due to existing professional obligations, including a current trial in the Eighth Judicial District Court, *Ernesto Raymundo-Lazaro et al. vs. Autozone Operations LLC Case No. A-23-870727-C*, multiple briefing deadlines and previously scheduled court appearances and depositions in unrelated matters, counsel for Plaintiffs requires additional time to prepare a thorough and complete opposition to Defendants' Motion for Summary Judgment. The parties agree that this extension is necessary to accommodate counsel's scheduling conflicts and ensure adequate time for

the preparation of the opposition brief. The requested extension is made in good faith and not for the purpose of delay, and will not prejudice any party or affect other scheduled dates in this matter.

WHEREFORE, the parties respectfully request that this Court extend the time for Plaintiffs to file their Opposition to LVMPD Defendants' Motion for Summary Judgment in the above-captioned case twenty-one (21) days, up to and including Tuesday, September 30, 2025.

IT IS SO STIPULATED AND AGREED.

DATED this 21st day of August, 2025.

DATED this 21st day of August, 2025.

LAGOMARSINO LAW

KAEMPFER CROWELL

/s/ Taylor N. Jorgensen

/s/ Kristopher J. Kalkowski

ANDRE M. LAGOMARSINO, ESQ. (#6711)

LYSSA S. ANDERSON, ESQ. (#5781)

TAYLOR N. JORGENSEN, ESQ. (#16259)

RYAN W. DANIELS, ESQ. (#13094)

3005 W. Horizon Ridge Pkwy., #241

KRISTOPHER J. KALKOWSKI, ESQ. (14892)

Henderson, Nevada 89052

1980 Festival Plaza Drive, Suite 650

Telephone: (702) 383-2864

Las Vegas, Nevada 89135

Facsimile: (702) 383-0065

Telephone: (702) 792-7000

Attorneys for Plaintiff Carlos Alvarado

Fax: (702) 796-7181

Attorneys for Defendants

ORDER

Based on the parties' stipulation and with good cause appearing, IT IS HEREBY ORDERED that plaintiffs' opposition to defendants' summary-judgment motion (ECF No. 38) is now due on Tuesday, September 30, 2025. Defendants' reply is due Tuesday, October 14, 2025.


UNITED STATES DISTRICT JUDGE

DATED: August 21, 2025